

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CAO GROUP, INC.,

Plaintiff,

v.

ZHUHAI JIASHU DIANZISHANGWU  
YOUXIANGONGSI  
D/B/A GD-WHITENING,

Defendant.

**Case No.: 1:24-cv-01211**

**Judge Thomas M. Durkin**

**Magistrate Judge Jeannice W. Appenteng**

**JURY TRIAL DEMAND**

**JOINT STATUS REPORT**

Pursuant to the Court’s October 25, 2024 Minute Entry [124], Plaintiff CAO Group, Inc. (“Plaintiff”) and Defendant No. 6 haiyi\_mall and Defendant No. 25 newage-store (“Cheng Defendants”)<sup>1</sup> (collectively, the “Parties”) submit the following Joint Status Report.

Now that the Court has ruled on Plaintiff’s Motion for Leave to File a Third Amended Complaint and Plaintiff has filed its Third Amended Complaint (“TAC”) [125], the Parties propose the following revised discovery schedule:

<b>EVENT SCHEDULED</b>	<b>GOVERNING LOCAL PATENT RULE</b>	<b>DEADLINE</b>
Answer or Other Response To TAC	N/A	November 11, 2024
Supplement Initial Disclosures of Both Parties in light of TAC	14 days (2 weeks) after Answer or other responsive pleading. (LPR 2.1)	November 25, 2024
Supplement Initial Infringement Contentions	14 days (2 weeks) after Initial Disclosures. (LPR 2.2)	December 9, 2024
Supplement Initial Non-Infringement, Unenforceability, and Invalidity Contentions	14 days (2 weeks) after Initial Infringement Contentions. (LPR 2.3)	December 30, 2024 (3 weeks to account for holidays)

<sup>1</sup> “Cheng” is in reference to He Cheng, counsel for Defendant Nos. 6 and 25.

<b>EVENT SCHEDULED</b>	<b>GOVERNING LOCAL PATENT RULE</b>	<b>DEADLINE</b>
Initial Response to Invalidity Contentions	14 days (2 weeks) after Initial Non-Infringement and Invalidity Contentions. (LPR 2.5)	January 20, 2025 (3 weeks to account for holidays)
Final Infringement, Unenforceability, and Invalidity Contentions	21 weeks after Initial Infringement Contentions. (LPR 3.1)	May 5, 2025
Final Non-Infringement, Enforceability, and Validity Contentions	28 days (4 weeks) after service of Final Infringement Contentions. (LPR 3.2)	June 2, 2025
Exchange of Claim Terms Needing Construction	14 days (2 weeks) after Final Validity Contentions. (LPR 4.1)	June 16, 2025
Close of Fact Discovery – Part 1	28 days after the date for exchange of claim terms and phrases under LPR 4.1. (LPR 1.3)	July 14, 2025
Opening Claim Construction Brief (by alleged infringer) and Joint Appendix	35 days (5 weeks) after exchange of claim terms. (LPR 4.2(a))	July 21, 2025
Responsive Claim Construction Brief (by party asserting infringement)	28 days (4 weeks) after Opening Claim Construction Brief. (LPR 4.2(c))	August 18, 2025
Reply Claim Construction Brief	14 days (2 weeks) after Responsive Claim Construction Brief. (LPR 4.2(d))	September 2, 2025
Joint Claim Construction Chart	7 days (1 week) after Reply Claim Construction Brief. (LPR 4.2(f))	September 9, 2025
Claim Construction Hearing	To be determined by the Court (within 28 days of filing of reply claim construction brief). (LPR 4.3)	Subject to the Court's availability (on or before October 7, 2025)
Claim Construction Ruling (fact discovery may resume)	To be determined by the Court.	Subject to the Court's availability
Discovery Opens Regarding Opinions of Counsel	35 days (5 weeks) before final close of fact discovery. (LPR 3.6)	35 days (5 weeks) before final close of fact discovery
Close of Fact Discovery – Part 2	42 days (6 weeks) after Claim Const. Ruling.	42 days (6 weeks) after Claim Const. Ruling

EVENT SCHEDULED	GOVERNING LOCAL PATENT RULE	DEADLINE
Expert Witness Reports of Parties with Burden of Proof	21 days (3 weeks) after claim construction ruling or close of discovery. (LPR 5.1(b))	21 days (3 weeks) after claim construction ruling or close of discovery.
Rebuttal Expert Witness Reports	35 days (5 weeks) after initial expert witness reports. (LPR 5.1(c))	35 days (5 weeks) after initial expert witness reports
Completion of Expert Witness Depositions	35 days (5 weeks) after rebuttal expert witness reports. (LPR 5.2)	35 days (5 weeks) after rebuttal expert witness reports

Date November 4, 2024

Respectfully submitted,

/s/ Sameeul Haque

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